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7 **IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

8 Rebekah Massie; and Quintus Schulzke,

No: 2:24-cv-02276-ROS--DMF

9  
10 *Plaintiffs,*

**PLAINTIFFS' MOTION FOR LEAVE  
TO FILE  
NON-ELECTRONIC EXHIBIT  
RE: COMPLAINT**

11 City of Surprise, et al.,

12 *Defendants.*

13  
14 Pursuant to District of Arizona Electronic Case Filing Administrative Policies and  
15 Procedures Manual Section II(N)(2), Plaintiffs Rebekah Massie and Quintus Schulzke  
16 request leave to file a video exhibit to the Complaint.

17 Proposed Exhibit A to the Complaint is a video of the August 20, 2024, meeting of  
18 the City Council of Defendant City of Surprise.

19 LRCiv.7.1(c) states that all documents submitted for filing in the ECF system shall  
20 be in a Portable Document Format (PDF). However, District of Arizona Electronic Case  
21 Filing Administrative Policies and Procedures Manual Section II(N)(2) recognizes that  
22 some files, like “videotapes,” are “not convertible to electronic form” for purposes of an

ECF filing and sets out an alternate filing procedure. Should leave be granted, Plaintiffs will follow that procedure.

Because Exhibit A to Plaintiffs' Complaint is a video file not capable of being submitted through the ECF portal, Plaintiffs respectfully request leave to file the exhibit in accordance with the procedures set out by Section II(N)(2) of the ECF Manual.

Dated: September 4, 2024

/s/ Daniel J. Quigley

Daniel J. Quigley

(State Bar No. 011052)

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## **FOUNDATION FOR INDIVIDUAL**

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\* *Pro hac vice* application forthcoming.

**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the foregoing document has been served upon the counsel for the parties in interest by operation of the Court's electronic case filing system, that a true and exact copy of the document will be served upon the parties with the Summons and/or Rule 4 waiver.

/s/ Daniel J. Quigley  
Daniel J. Quigley